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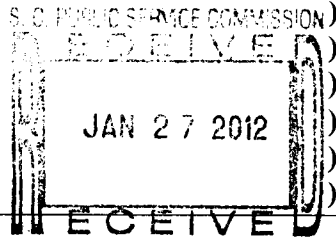
STATE OF SOUTH CAROLINA

(Caption of Case)

Frontier Access Service Tariff - NCUC No. 1  
("GAS Tariff")  
Frontier Facilities for Intrastate Access Tariff  
("FFIA Tariff")

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET



DOCKET  
NUMBER: 2012 - 54 - C

(Please type or print)

Submitted by: John M. S. Hoefer

SC Bar Number: 2549

Address: PO Box 8416

Telephone: 803-252-3300

Columbia, SC 29202-8416

Fax: 803-256-8062

Other:

Email: jhoefer@willoughbyhoefer.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

**WILLOUGHBY & HOEFER, P.A.**

ATTORNEYS & COUNSELORS AT LAW

930 RICHLAND STREET

P.O. BOX 8416

COLUMBIA, SOUTH CAROLINA 29202-8416



MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL  
TRACEY C. GREEN  
BENJAMIN P. MUSTIAN  
ELIZABETH ZECK\*  
ELIZABETHANN LOADHOLT FELDER  
ANDREW J. MACLEOD  
CHAD N. JOHNSTON  
JOHN W. ROBERTS

\*ALSO ADMITTED IN TX

January 25, 2011

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, South Carolina 29210

Re: Frontier Access Service Tariff – NCUC No. 1 (“FAS Tariff”)  
Frontier Facilities for Intrastate Access Tariff (“FFIA Tariff”)

Dear Ms. Boyd:

On December 19, 2011, Frontier Communications of the Carolinas Inc. (“Frontier”) filed tariff revisions intended to reflect implementation of the intercarrier compensation regime for certain VoIP-PSTN traffic mandated (absent agreement by the affected companies) by the Federal Communications Commission (“FCC”) in its November 18, 2011 Report and Order and Further Notice of Proposed Rulemaking in WC Dockets No. 10-90, etc. (“Order”).

The FCC’s Order requires application of rates not higher than interstate switched access rates to both originating and terminating VoIP-PSTN traffic. (*See, e.g.*, FCC Order, ¶ 961 (“We therefore permit LECs to file tariffs that provide that, in the absence of an interconnection agreement, toll VoIP-PSTN traffic will be subject to charges not more than originating and terminating interstate access rates.”) The tariff revisions of other companies, including, among others, Verizon and AT&T, properly reflect application of interstate switched access rates to both originating and terminating VoIP-PSTN traffic. Frontier’s tariff, however, incorrectly applies the interstate rate to only terminating VoIP-PSTN access minutes. (FAS Tariff § 2.3.11(C); FFIA Tariff § 2.3.10(C).)

Ms. Jocelyn Boyd

January 25, 2012

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Frontier cannot deviate from the VoIP-PSTN compensation regime ordered by the FCC (regardless of Frontier's tariff terms). Verizon, therefore, asks the Commission to require Frontier to modify its tariff to correctly reflect application of its interstate switched access rates to originating, as well as terminating, VoIP-PSTN access minutes.

Sincerely,

**WILLOUGHBY & HOEFER, P. A.**

A handwritten signature in black ink, appearing to read "John M. S. Hoefer", with a long horizontal flourish extending to the right.

John M. S. Hoefer

JMSH/cm

cc: Dulaney L. O'Roark, Esquire